

**Louisville Metro Air Pollution Control District**  
**850 Barret Ave., Louisville, Kentucky 40204**  
**xx xx**

**Federally Enforceable District Origin Operating Permit**  
**Statement of Basis**

**Company:** Algood Food Company

**Plant Location:** 7401 Trade Port Drive, Louisville, Kentucky 40258

**Date Application Received:** 07/30/2010 and 11/25/2014

**Date of Public Notice:**

**District Engineer:** Shannon Hosey

**Permit No:** O-1440-15-F

**Plant ID:** 1440

**SIC Code:** 2099

**NAICS:** 311911

**Introduction:**

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), and particulate matter less than 10 microns (PM<sub>10</sub>); and is a non-attainment area for particulate matter less than 2.5 microns (PM<sub>2.5</sub>); and partial non-attainment area for sulfur dioxide (SO<sub>2</sub>).

**Application Type/Permit Activity:**

☐ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☒ Permit Renewal

**Compliance Summary:**

☐ Compliance certification signed

☐ Source is out of compliance

☐ Compliance schedule included

☒ Source is operating in compliance

**I. Source Information**

1. **Product Description:** Algood Food Company manufacturers peanut butter.
2. **Process Description:** Manufacturers peanut butter from preshelled peanuts. Plant has 2 lines of peanut sifting, roasting, skinning (called blanching). Peanuts are then blended to form peanut butter. Additives are conveyed pneumatically and combined with product. Individual jars are stamped with a date by an inkjet process.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	One (1) laser sorter with pneumatic conveyors, one (1) aspirator and one (1) cyclone. Two (2) continuous nut roasters. Line A: Two (2) Blanchers (A1 and A2) and Sorter. Line B: Two (2) Blanchers (B1 and B2) and Sorter.
U2	Ink-jet printing operation for marking cased of products. One (1) Biomist Power Sanitizing System used to sanitize food contact surfaces with alcohol based sanitizer.
U3	One (1) 550 gallon gasoline tank used for vehicle refueling. Tank is equipped for submerged filling.

5. **Fugitive Sources:** Infrequent plugging of the removal of waste peanut skins which are conveyed pneumatically to a semi-tractor trailer.
6. **Permit Revisions:**

Permit No.	Issue Date	Public Notice Date	Type	Page No.	Description
182-02-F	03/31/2006	12/04/2005	Initial	Entire Permit	Initial Permit Issuance
O-1440-14-F	xx/xx/2015	02/18/2015	Renewal	Entire Permit	Scheduled Permit Renewal

**7. Emission Summary:**

<b>Pollutant</b>	<b>District Calculated Actual Emissions (tn/yr) 2009 Data</b>	<b>Pollutant that triggered Major Source Status (based on PTE)</b>
<b>CO</b>	1.53	No
<b>NO<sub>x</sub></b>	1.82	No
<b>SO<sub>2</sub></b>	0.01	No
<b>PM</b>	10.58	No
<b>PM<sub>10</sub></b>	8.09	Yes
<b>VOC</b>	0.784	No
<b>Total HAPs</b>	0.41	No
<b>Single HAP</b> Methanol	0.10	No

**8. Applicable Requirements:**

☐ PSD      ☐ 40 CFR 60      ☒ SIP      ☐ 40 CFR 63  
☐ NSR      ☐ 40 CFR 61      ☒ District-Origin      ☐ Other

**9. MACT Requirements:** The source has no future MACT requirements.

**10. Referenced Federal Regulations in Permit:** NA

**II. Regulatory Analysis**

- 1. Acid Rain Requirements:** Algood Food Company is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Algood Food Company does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 3. Prevention of Accidental Releases 112(r):** Algood Food Company does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

#### 4. Basis of Regulation Applicability

##### a. Plant-wide

Algood Food Company is a potential major source for the pollutant PM<sub>10</sub>. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements. The source requested limits of the criteria pollutant PM/PM<sub>10</sub> < 25 tn/yr, to be a FEDOOP STAR Exempt source as defined by Regulation 5.00, section 1.13.5.

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

EU U3, the 550 gallon gasoline tank used for vehicle refueling, was removed.

##### b. Applicable Regulations:

Regulation	Title	Type
2.17	Federally Enforceable District Origin Operating Permits	SIP
6.09	Establishes emission standards for processes that emit PM which were constructed before September 1, 1976	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.25	Standards of Performance for Existing Process Operations	SIP

c. **Basis for Applicability**

Regulation	Basis for Applicability
2.17	Applies to any stationary source, or one or more processes or process equipment at a stationary source, for which the owner or operator voluntarily applies for a federally enforceable District origin operating permit.
6.09	Establishes emission standards for processes that emit PM which were constructed before September 1, 1976.
7.08	Establishes the requirements for PM emissions from new processes that commenced construction after September 1, 1976.
7.25	Establishes the requirements for VOC emissions, apply to a process not elsewhere regulated in District Regulation 7, and applies to new processes commenced after June 13, 1979.

d. **Emission Unit U1 – Peanut Butter Manufacturing**i. **Equipment:**

EU	Emission Point	Description Make/Model	Applicable Regulation
U1	E1	Laser Sorter, BEST USA, Inc., Helius 1200	7.08
	E2	Proctor & Schwartz, K910124 Peanut Roaster	
	E3	Proctor & Schwartz, T21293 Peanut Roaster	
	E5	Line A: Cantrell & Satake, VB 5000 & Scan Master, Two (2) Blanchers (A1 and A2) and Sorter	
	E6	Line B: Cantrell & Satake, VB 5000 & Scan Master, Two (2) Blanchers (B1 and B2) and Sorter	6.09

ii. **Standards/Operating Limits**1) **PM/PM<sub>10</sub>**

- (a) Regulation 2.17, section 5.1, allows the source to set a synthetic limit below the major source threshold. Source requested a combined total plant-wide synthetic limit of less than twenty-five (25) tons in a 12 consecutive month period, for the pollutant PM<sub>10</sub>.
- (b) For Emission Points subject to Regulation 6.09 and Regulation 7.08 for PM, the PM emission standards are calculated per section 3.1.2 and 3.2. The equation to calculate the hourly PM emission limit is  $E = 4.10$

$P^{0.67}$  for 6.09 or  $E = 3.59 * P^{0.62}$  for 7.08, where E is the allowable lb/hr PM emission limit and P is the process weight rate expressed in tons/hr.

- (c) Regulation 2.17, section 5.1, requires the source to operate the dust controls at all times emission points E1, E5 and E6 are in operation, in order to show compliance with lb/hr PM standard.

## 2) Opacity

Regulation 6.09, section 3.3.1 and Regulation 7.08, section 3.1.1 establishes an opacity standard of less than 20%.

### e. Emission Unit U2 – Ink-jet Printing and Cleaning

#### i. Equipment:

EU	Emission Point	Description Make/Model	Applicable Regulation
U2	E10	Hitachi & Videojet, PX-D260U Ink-jet Printer	7.25
	E12	Sanitizing System	

#### ii. Standards/Operating Limits

##### VOC

VOC emissions from equipment subject to Regulation 7.25 cannot exceed five (5) tons, plant-wide, during any consecutive 12-month period unless a BACT is submitted and approved.

### III. Other Requirements

- Temporary Sources:** The source did not request to operate any temporary facilities.
- Short Term Activities:** The source did not report any short term activities.
- Emissions Trading:** N/A
- Operational Flexibility:** The source did not request any operation flexibility.

**5. Compliance History:**

Incident #	Date	Regulation Violated	Result
03038	08/07/2002	Reg. 1.13, Section 2 – Failure to control objectionable odors	Agreement \$175
03113	08/12/2002	Reg. 7.08, Section 3 – Opacity Reg. 1.09, Section 0 – General prohibition of Air Pollution	Agreement \$2,000
03137	08/08/2002	Reg. 2.03, Section 1 – Operating equipment without a District permit	Agreement \$250
03299	03/13/2003	Reg. 2.03, Section 5 – Failure to comply with District permit	Agreement \$750
03551	11/05/2003	Reg. 7.25, Section 3 – Failure to comply with VOC limit or BACT Reg. 2.03, Section 5 – Failure to comply with District permit	Agreement \$1,500

**6. Calculation Methodology or Other Approved Method:**

The PM/PM<sub>10</sub> emissions from manufacturing peanut butter are determined using the emission factors in AP42, Chapter 9.10.2.1 “Almond Processing” and AP42, Chapter 9.13.2 “Coffee Roasting.”

**7. Insignificant Activities**

Description	Quantity	Basis
Combustion sources < 10 MMBtu/hr Natural Gas (2.8 MMBtu/hr, 2.4 MMBtu/hr, 3.2 MMBtu/hr and 2.4 MMBtu/hr)	4	Regulation 1.02, Appendix A, section 1.1
Fixed or mobile internal combustion engines and vehicles used for transport of passengers or freight, unless regulated elsewhere	4	Regulation 1.02, Appendix A, section 2
Brazing, Soldering or Welding Equipment	3	Regulation 1.02, Appendix A, section 3.4
Emergency relief vents, stacks and ventilating systems	3	Regulation 1.02, Appendix A, section 3.10
Equipment using only peanut oil, sunflower oil, cottonseed oil or canola oil	3	Regulation 1.02, Appendix A, section 3.19
Dust or particulate collectors that are located in-doors, vent directly indoors into the work space, collect no more than one ton of material per year and do not collect materials listed in Regulation 5.11, 5.12 or 5.14 (Two Jar Washers that blow out any particulate matter from the jars and capture it in a filter box)	2	Regulation 1.02, Appendix A, section 3.21

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.